

EXHIBIT A

IN THE UNITED STATES DISTRICT COURT FOR
THE WESTERN DISTRICT OF PENNSYLVANIA

| | | |
|-------------------------------|---|---------------------------|
| ANTHONY DEFRAZCO, | : | |
| Plaintiff, | : | : No. 04-230-E |
| | : | : Magistrate Judge Baxter |
| V. | : | : District Judge Cohill |
| | : | |
| WILLIAM WOLFE, et al., | : | |
| Defendants. | : | |

To:
Senior Deputy Attorney General (Attorney for defendants)
Mary Lynch Friedline, Esq.

**DEFENDANTS' RESPONSE TO
PLAINTIFF'S FIRST REQUEST
FOR PRODUCTION OF DOCUMENTS**

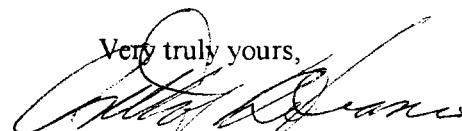
Pursuant to Rule 26 and rule 34 of the Federal Rules of Civil Procedure, plaintiff requests that the defendants produce the following documents. Please produce the documents at plaintiff's place of confinement at 10745 Route 18, Albion, Pa. 16475-0002. Please note that the term "document" is defined broadly under Rule 34(a)(1)).

1. All people involved in the March 8, 2005, transfer of plaintiff; the names of the people who had knowledge of the transfer; and how they participated in it. This is to include the transfer petitions in 2005 and 1999.
SEE ATTACHED SHEET FOR RESPONSES.
2. The production of Plaintiff's Z-Code vote sheets from 1999 until 2006.
3. All medical reports from 1998 through 2006; these include doctor's notes and all psychiatric reports and notes. Including prescriptions for medications.
4. All psychological reports on plaintiff, by psychological staff, from 1998 through 2006.
5. Plaintiff requests to be permitted to inspect his inmate file and have copies made of any material he may deem essential to this lawsuit.
6. A copy of the D.O.C. criteria for Z-Code status.

Thank you for your prompt attention to this matter.

February 28, 2006

C; file; clerk


Very truly yours,
Anthony DeFranco CZ-3518
10745 Route 18
Albion, Pa. 16475-0002

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

ANTHONY DEFARANCO,)
)
Plaintiff,)
)
v.) C.A. No. 04-230 E
)
WILLIAM WOLFE, ET AL.,)

**DEFENDANTS' RESPONSE TO PLAINTIFF'S FIRST
REQUEST FOR PRODUCTION OF DOCUMENTS**

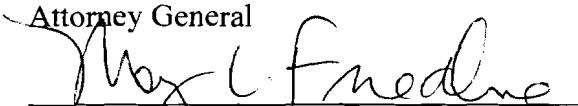
1. On the March 8, 2005 transfer, Casey Kephart requested the transfer and Don Williamson approved the transfer. In 1999, the transfer was requested by Frank Nedwidek and Don Williamson approved the transfer.
2. These vote sheets are Objected to as seeking information that is privileged and confidential. Providing these documents would give the inmate information that could be used and manipulated by him which could adversely affect his treatment program. Notwithstanding this objection, copies of the vote sheets dealing with z-code are being produced, with redactions of privileged and confidential information.
3. The medical and psychiatric file can be made available for you to view and request copies at your own expense. Defendants reserve the rights to raise specific objections, including as to relevance, until plaintiff identifies documents for copying. Please contact Bill Barr, Superintendent's Assistant, to make these arrangements.
4. See response to number 3 above.

5. Production of the complete institutional file is Objected to on the grounds that it contains information that is privileged and confidential, including classification information. Without waiving this Objection, the redacted file can be made available for you to view. Please contact Bill Barr, Superintendent's Assistant, to make these arrangements

6. This request for DOC criteria used for Z-Code status is Objected to as seeking information that is privileged and confidential. Providing these procedures could pose as a security risk to inmates, staff and/or the institution. Further, providing these procedures would give the inmate information that could be used and manipulated by him and could adversely affect his treatment program.

Respectfully submitted,

THOMAS W. CORBETT, JR.
Attorney General


Mary L. Friedline
Senior Deputy Attorney General
Attorney I.D. No. 47046

Susan J. Forney
Chief Deputy Attorney General

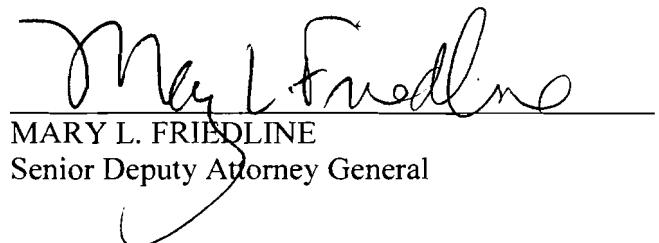
Office of Attorney General
6th Floor, Manor Complex
564 Forbes Ave.
Pittsburgh, PA 15219
Phone: (412) 565-3520
Fax: (412) 565-3019

Date: March 31, 2006

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing
Defendants' Response to Plaintiff's First Request for Production of Documents was served
upon the following, by first-class mail this March 31, 2006.

Anthony DeFranco, CZ-3518
State Correctional Institution
At Albion
10745 Route 18
Albion, PA 16475



MARY L. FRIEDLINE
Senior Deputy Attorney General